

VIRGINIA: IN THE CIRCUIT COURT OF THE CITY OF VIRGINIA BEACH

DEBORAH RICHARDS,

Plaintiff,

v.

At Law No. CL21- 1155

PLAINTIFF DEMANDS TRIAL BY JURY

PETSMART, Inc.

Serve: Corporate Creations Network, Inc., R.A.
425 W. Washington Street, Suite 4
Suffolk, VA 23434-5320

Defendant.

COMPLAINT

COMES NOW the Plaintiff, **DEBORAH RICHARDS**, and moves for judgment against the Defendants, **PETSMART, INC.**, jointly and severally, on the grounds and in the amount as hereinafter set forth:

1. Defendant, **Petsmart, Inc.**, is a corporation properly qualified to conduct business in the Commonwealth of Virginia, and are the owners and/or operators of PetSmart, Inc., located on 3364 Princess Anne Road in the City of Virginia Beach, Virginia.

2. As owner and/or operator of said store, a place of business to which the general public is invited, it is the duty of Defendants, their agents and/or employees, to maintain the premises in a reasonably safe condition; to make reasonable inspections to determine whether any latent defects exist and to warn the public of any defects known to it, its agents and employees.

3. Notwithstanding said duties, on or about May 5, 2019, Defendants, their agents and/or employees, negligently created a spill and/or negligently failed to clean up a spill on an aisle open to customers and other invitees, and negligently failed to remove the substance or to place any warning signs or markings around said area.

4. At the same time and place aforesaid, Plaintiff was walking in the aisle of said facility at or near the area in which Defendants, their agents and/or employees negligently allowed a substance to remain. As a direct and proximate result of Defendants' negligence as aforesaid, Plaintiff slipped and fell, sustaining serious injuries.

5. That as a direct and proximate result of the said defendants negligence, plaintiff was caused to sustain serious and permanent injuries; has suffered great pain of body and mind; has sustained serious and permanent disability, deformity and loss of earning capacity; has lost wages, has incurred hospital, doctor, medical and related bills and expenses in an effort to be cured of said injuries; has suffered inconvenience; has endured extreme humiliation; and, will in the future suffer and incur the above.

WHEREFORE, Plaintiff, Deborah Richards, demands judgment against Defendant, PetSmart, Inc., the amount of **FOUR HUNDRED THOUSAND DOLLARS (\$400,000.00)**, plus interest from May 5, 2019, and her costs in this behalf expended.

DEBORAH RICHARDS

By: 

Of Counsel

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